INEEL PUBLIC MEETING ON PROPOSED CLEANUP
PLAN FOR IDAHO CHEMICAL PROCESSING PLANT
(INTEC)

IDAHO FALLS, IDAHO

Monday, November 16, 1998

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3	(INTEC)	2	
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1 5			meeting. I'm Erik Simpson. I am the community
] <sub>6</sub>			relations plan coordinator for the INEEL
],		6	Environmental Restoration Program. And I'm going
		7	to facilitate tonight's meeting.
و ا		8	We're here tonight to discuss the
1	TD2110 T2220 T02110	9	results of the Waste Area Group 3 Remedial
10	IDAHO FALLS, IDAHO	10	Investigation/Feasibility Study and then also to
111	Monday, November 16, 1998	11	discuss the proposed plan. For those who don't
12			already know, Waste Area Group 3 is the
13			environmental restoration program designation for
14			the Idaho Nuclear Technology and Engineering
15			Center, or what some people formerly called the
16			Chem Plant,
17		17	This is the fifth facility-wide
18			environmental investigation that we've completed at
19			the INEEL, and we have four more to go under our
20			Federal Facility Agreement and Consent Order. And
21			since this is really, probably, the most
22			complex site that DOE, EPA, and the state have
23	Nancy Schwartz Reporting		investigated, the agencies have agreed to extend
24	2421 Anderson Street Boise, Idaho 83702		the comment period an additional 30 days, so now
25	208-345-2773 Fax 208-424-1231		
-		23	the comment period will end on December 22nd.
1	Page 2	2	Page 4
2	PUBLIC COMMENT	1	The last time we held public clean-up
3	PAGE		meetings in Idaho Falls was in February of this
	BRAILSFORD, BEATRICE 73		year when we were discussing the Test Area North
5	JOBE, LOWELL 71		Remedial Investigation/Feasibility Study and
6			proposed plan. At the request of our stakeholders
Į.		6	and the citizen's advisory board, we revised that
[ ]			document, and it is being rereleaseed for public
8		8	comment this month. For those who would like a
9		9	copy of that document, see me at the break, and
10		10	I'll get your address and get you a copy.
11		11	At the back of the room, we have several
12		12	
		1	Group 2 proposed plan. We have feet sheet. We
13		13	Group 3 proposed plan. We have fact sheets. We
14			have the meeting presentation, copies of the
14 15		14	
14 15 16		14 15	have the meeting presentation, copies of the slides. We have the Federal Facility and Consent
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14 15 16 17 18 19 20 21 22 23		14 15 16 17 18 19 20 21 22 23 24	have the meeting presentation, copies of the slides. We have the Federal Facility and Consent Order, which outlines all these clean-up projects, and I have some community relations plans as well.  At this time I would like to review the agenda with you. First, we're going to have the presentation and then we will have a question-and-answer session. And since we have kind of a lengthy presentation, I would like to

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1 clarification, maybe, an acronym that you're not

- 2 familiar with. But if a question does come up that
- 3 the presenter can't immediately answer, I will
- 4 write it on a tablet up here or you can write it on
- 5 a tablet in the back of the room. I also have some
- 6 cards at the back table where you can also jot down
- 7 your question, and we'll get to those during the
- 8 question-and answer session.

Following that session, we will have

10 the formal comment session where your comments are

11 entered into the record. And we have a court

12 reporter here tonight who is recording all portions

13 of this meeting. Also you can submit your comments

14 in writing, and we have several forms here tonight,

15 postage-paid forms that will allow you to write

16 your comment and fold the comment and place it in

17 the mail, and we'll get the comment.

Also there are comment forms at the back

19 of the proposed plan, postage-paid comment forms.

20 And also I have a tape recorder here tonight, so if

21 somebody doesn't want to make a comment in front of

22 a group of people, they can log a comment on the

23 tape, and I'll have it transcribed.

24 I should also mention at this time that

25 we have a brief survey on the back of the agenda.

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- 1 Please take a few minutes after the meeting and jot
- 2 down your impressions. This will really help us
- 3 focus on improvements that we may need to make for
- 4 future meetings.
- At this time I would like to introduce
- 6 the presenters -- or the principals who are
- 7 here tonight. With the Environmental Protection
- 8 Agency, Region 10 Seattle, we have Wayne Pierre.
- 9 And Wayne will give an overview of the project, and
- 10 he'll talk about the Tank Farm, which is one of the
- 11 primary contributors to contamination at the
- 12 INTEC.
- 13 We have Talley Jenkins, who is the
- 14 project manager for the Department of Energy. And
- 15 Talley will discussion soils under buildings and
- 16 structures, other surface soils, the SFE-20 tank
- 17 system and buried gas cylinders.
- Next to Talley we have Scott Reno. 18
- 19 Scott is with the State of Idaho, Department of
- 20 Health and Welfare, Division of Environmental
- 21 Quality. He was also instrumental in drafting this
- 22 proposed plan, and he was involved in the
- 23 investigation of INTEC. And he will discuss the
- 24 perched water and the Snake River Plain Aquifer.
  - At this time I would like to turn it

1 over to Wayne Pierre.

- MR. PIERRE: Thanks, Erik.
- 4 Pierre. I'm with the Environmental Protection
- 5 Agency. Scott Reno and Talley Jenkins, we're

As Erik mentioned, my name is Wayne

- 6 actually going in the order of I'll give an
- 7 overview presentation, followed by Talley. We'll
- 8 talk about the soils, and then Scott will do
- cleanup and discuss the other facilities.

Erik mentioned or discussed why we're

- 11 here. Again, we are here because we do need public
- 12 input. The alternatives that we have identified,
- 13 the alternatives that we believe are preferred, may
- 14 not be the same as you think.

We have a lot of assumptions in how we

16 made our decisions, and we would like to have your

17 input on this. One of the things I should mention

18 is everyone in the back, for those who can't see,

19 can read along with this presentation. Also in the

- 20 back I would ask that folks get a copy of the
- 21 proposed plan. There are still copies in the
- 22 back.

23 One of the things, when people look at

24 cleaning up the Department of Energy facilities,

25 questions often come to mind, why does it cost so

Page 8

- 1 much to clean up this type of hazard. It didn't 2 cost that much to create the hazard, but oftentimes
- 3 it costs hundreds to thousands of times more to fix
- 4 it.
- Radioactivity -- and I know that there 5
- 6 is a lot of debate on what levels are safe, but the
- 7 levels that we look at for dealing with radioactive
- 8 contamination is orders of magnitude lower than the
- 9 numbers that we look at for dealing with chemical
- 10 contamination. We're trying to address those small
- 11 quantities of radionuclides and the extra safety
- 12 that is involved.
- 13 Why do the agencies want the public's
- 14 input? Again, one of the nine criteria that we
- 15 will talk about later is community input. We need
- 16 to know how you feel, the folks who will be living
- 17 close to the cleanup, whether or not it makes sense
- 18 to you, whether it makes sense to build a disposal
- 19 facility on site, whether it makes sense to spend
- 20 this kind of money, whether it makes sense to have
- 21 contingency actions, all those things that we will
- 22 be talking about today, we would like to have your
- 23 input on that.
- 24 I guess, last but not least, why is the
- 25 proposed plan so complicated. It's over 50 pages

25

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1 long. This is a very complicated facility. This

- 2 is the facility where the Department of Energy
- 3 dissolves fuel rods. It's the facility where the
- 4 Department of Energy stores high-level waste. This
- 5 is the facility where, at least since 1952, there
- 6 have been numerous spills and a lot of contaminated
- 7 soil. And to try to explain that, we've explained
- 8 that in these documents -- tried to condense that
- 9 into this proposed plan.

So I hope you bear with us as you read 11 it. You can get access to these documents at the 12 technical library. Is this available right now on 13 the Internet? You can also get it looking at INEEL 14 dot World Wide Web.

Many of you here already know the 15 16 background of INEEL. Again, operations started in 17 '52. The Idaho National Engineering and 18 Environmental Laboratory is on the national 19 priority list. I'm going to skip over some in the 20 interest of time. If somebody would like me to go 21 back to it, please let me know or read along.

As placing the INEL -- I have a tendency 22 23 to keep calling it INEL, I hope you will bear with 24 me. I haven't gotten used to the double E on 25 INEEL -- identified that we felt and the

1 determining acceptable risk. Therefore the

- 2 Superfund program, which is defined by the National
- 3 Contigency Plan, the objectives are to provide an
- 4 analysis of the baseline risk to provide a basis
- 5 for determining levels of chemicals, to include the
- 6 radionuclides that can be made on site, to provide
- 7 a basis for comparing the potential health impacts
- 8 for each of the alternatives that we have
- 9 identified, and then provide a consistent process
- 10 for evaluating, documenting the public health
- 11 threats. The consistency is not just within the
- 12 site. It's consistency among sites. It's
- 13 consistency between federal facilities and private
- 14 sites. So it's a national consistency that we
- 15 attempt to achieve through this process.

16 One of the things that we look at in 17 determining risk is future use scenarios. What

- 18 will happen to the Idaho National Engineering and
- 19 Environmental Laboratory as we look down the
- 20 years? It's easy to say what INEL will look like
- 21 today and what it will look like 10 years and what 22 it will look 30 years from now, but as you go
- 23 further out in time, the risk potential, as has
- 24 happened for many Department of Defense facilities,
- 25 that the INEEL may leave the government hands and

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1 Environmental Protection Agency was taking turns

- 2 that there were hazards at this facility that did
- 3 require urban investigation. And as Erik
- 4 mentioned, in the process of remedial investigation
- 5 feasibility studies that we have concluded to date
- 6 in all of them, some action has been warranted at
- 7 each of the Waste Area Groups. The Idaho Chemical
- 8 Processing Plant is one of 10 waste area groups at

9 INEL.

10 Again, referring to the proposed plan, 11 if you take a look at Table 11, you can get a quite 12 overview of what the groups are that we're talking 13 about. Table 11 is in the back of the proposed 14 plan. What the groups are that we're talking 15 about, the seven groups, the types of monies that 16 we're talking about and what the preferred 17 alternative is.

18 I should mention that in the 95 sites 19 that we looked at, the majority of those sites did 20 not require further action. Forty sites did. And 21 the bases for that has to do what is considered 22 acceptable risk. In this case, termed unacceptable 23 risk. Let me talk a little bit about the question 24 of risk assessment. And every agency, even in my 25 agency, each department has different ways of

Page 12 1 may wind up, in part, being using for residential.

- 2 That potential residential is one of the
- 3 scenarios that we looked at that assumes that there
- 4 may be a household. There may be a basement that
- 5 is constructed. The soil that is the low grade
- 6 would be excavated and brought to grade and that
- 7 plants and vegetables would be growing on that
- 8 property and families with children would be living
- 9 on the property. That is the residential scenario

10 that we looked at for the future.

11 The risk assessment that we performed

12 for human health, carcinogenic potential, the

- 13 numbers that we would use would be one increased
- 14 tumor in 10,000-fold population. These numbers and
- 15 these cancer slope factors that we divide from are
- 16 based primarily on animal studies. For EPA we
- 17 treat radionuclides and chemical risk the same. We
- 18 look at a health base number, and we use that
- 19 number for determining what the risk may be.

Once we've decided that there is 20

- 21 unacceptable risk, and where these seven groups
- 22 that you see on those boards around you, we decided
- 23 there is a potential unacceptable risk in each of
- 24 them, then we go to what is referred to as a
- 25 feasibility study. First, we identify the

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1 objective. What are we trying to achieve? What 2 we're trying to achieve is to make a site an 3 acceptable risk, so whether or not an alternative, 4 can we take a risk that if we do nothing, we find 5 that unacceptable, and by doing something, that 6 residual risk now makes it acceptable to human 7 health and the environment.

Once we've identified these objectives. 8 9 then we look at alternatives that can meet those 10 objectives. We analyze each of the individual 11 alternatives to see how they fare against what we 12 can call the nine criteria, which I will talk about 13 in the next slide. Then we also compare between 14 the alternatives to see which one best meets the 15 criteria.

16 The nine criteria that we look at, we're 17 evaluating alternatives which are: Thresholds, 18 that is, it must be protective and must comply with 19 the law. The balancing, which are technical, those 20 five criteria round out our understanding of how 21 well the proposed alternative or the alternative 22 that we're evaluating, how implementable it is, 23 whether or not in trying to implement the remedy, 24 for example, for some facilities the remedy may be 25 on-site incineration. Is the on-site incineration

A picture of the Tank Farm. This area 2 is the stack for orientation and this is the Tank

3 Farm area. This is a showing of construction of

4 some of the tanks. This is the grade area over

5 here. These tanks are all below grades, about

6 10 feet of dirt that sits on top of these tanks.

7 The tanks were constructed on the bedrock.

So what we need to talk about are two 9 things: what we know and what we don't know,

10 because there is a lot about all of these sites

11 that we don't know. We do know there is

12 approximately a 146,000 cubic yards, based on

13 what we know, as far as releases. We know that

14 concentrations, at least in one spot, based on one

15 report, can be as high as 400 R per hour. We know

16 that some of the concentrations that we detected,

17 for example, this number here, if people are

18 familiar with what the Department of Energy refers

19 to as their transuranic waste, that criteria is 100

20 nanocuries per gram, so we do know that some of

21 these concentrations qualify as transuranic

22 wastes.

We know that most of the radionuclide 23 24 contamination in the Chem Plant is located in the 25 area of the Tank Farm soils. Most importantly, we

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1 more hazardous than the contamination present in

2 the soil that is on the site? So then we look at 3 the short-term risk to the community, to the

4 workers, to the environment. We look at our

5 implementables. What is the availability of the

6 materials, of the administrative implementability

7 of the project? And, obviously, we do look at the

8 cost of the project.

The modifying criteria, there are two 10 and the reason that it is listed in this order is 11 based more on timing than anything else. The first 12 thing that we have to do is find alternatives of 13 past threshold. The second thing is, we do a 14 technical evaluation, the balancing criteria, then 15 we seek -- as DOE, working in a team, we have state 16 EPA input, we have other stakeholder input and as 17 meetings like tonight and in public comment periods 18 that, as we're presently in, we seek the community 19 input.

20 So with that knowledge, then, one of 21 the first groups we're looked at is the Tank Farm 22 interim action. Again, as I mentioned, the Tank 23 Farm operation started in 1952. There are 20 24 underground tanks and they range in size from 25 18,000 gallons to 300,000 gallons.

Page 16 1 know that by doing nothing there is run-on, there

2 is precipitation that is moving into the Tank Farm

3 that is driving these contaminants that are in the

4 soil further down in the unsaturated zone and into

5 the perched water and into the Snake Rive Plain

6 Aquifer.

What don't we know? We really don't

8 know how the Tank Farm will be closed. We know the

9 Tank Farm is currently scheduled to be in operation

10 until 2015. We know that we've expected the

11 Tank Farm will undergo closure by 2018.

12 There is an environmental impact statement being

13 developed and there will be a closure plan that the

14 Department of Energy will be submitting to the

15 state with the closure of this Tank Farm. This

16 Tank Farm -- besides the fact that it's high-level

17 waste is also hazardous waste, so that term is

18 usually combined to declare it to be mixed waste,

19 and that will have to undergo a closure, but

20 whether or not the tanks will be emptied and

21 removed, whether they will be emptied and dropped,

22 whether some other technology will be done, we

23 don't have knowledge of that at this moment.

24 We also don't know how quickly and to

25 what amount some of the contaminants that are

1 present in the soil at the Tank Farm are moving

2 into the aquifer. For example, plutonium is

3 very -- the movement of plutonium is very dependent

4 upon the pH of the soil, the oxidation state of

5 plutonium and other parameters that we hope to

6 obtain more information on. We don't really know

7 all the spills and the locations of the spills.

8 And it's also a moving target because as we talked

9 about, there may be more spills. So we may never

10 really know all the locations of the spills at the

11 tank farms, including the Tank Farm until we take

12 final action.

13 So, as I mentioned before in how we 14 evaluate alternatives, the first thing that we look

15 at are the objectives and we know that we want to

16 protect the drinking water aquifer. We know that

17 we would like to do filtration for the contaminated

18 soils. We know that we would like to introduce

19 filtration for the contaminated soils. We would

20 like to prevent worker contact -- to ensure that

21 worker contact is prevented by DOE action. And we

22 know that we need to collect more information on

23 the things that we don't know.

From that -- from those objectives,

25 we've identified three remedial alternatives. The

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1 and the Hazardous Waste Closure Program and the

2 Federal Facility Agreement and Consent Order all

3 work together to achieve one solution for the Tank

4 Farm.

5 With that, unless there is some

6 clarifying questions, I would like to introduce

7 Talley Jenkins.

8 AUDIENCE MEMBER: So, basically, you're

9 saying that Alternative 3, by the time you learn

10 more about the best way to clean up the facility?

11 MR. PIERRE: If we were to -- one of the

12 things that we don't want to do in an interrupt

13 action is to do something that is going to

14 interfere with the final. If the Tank Farm -- if

15 the decision was made to take the contents out and

16 to close the Tank Farm in place, the shells of the

17 tanks, we would still be obligated to prevent

18 run-on and percolation of water through the sites,

19 so that makes sense.

20 If the decision was made to remove the

21 contents and remove the tanks, there may be quite a

22 few years that would go on, maybe up to 2035 before

23 that would actually happen. If that was the case,

24 trying to prevent run-on, trying to minimize the

25 water or take the water, which is currently

Page 18

1 first one is always placed as a baseline. That is,

2 what if we did nothing? What if we just let things

3 go as they are? That is the No Action Alternative.

4 Alternative 2 is actually institutional controls

5 with additional monitoring. Alternative 3

6 involves -- Alternative 2, the institutional

7 controls and surface water controls.

Now, based on the objectives that I 9 mentioned earlier, Alternatives 1 and 2 really do 10 nothing about the Snake River Plain Aquifer and

11 protecting from leaching of these contaminants.

Alternative 3, based on what we have 13 been looking at, has the ability of reducing the

14 run on -- the rainwater, the percolation of water

15 in the Tank Farm, by 80 percent. So by reducing

16 the amount of water running through the Tank Farm,

17 we also reduce the potential for leaching of those

18 contaminants into the Snake River Plain Aquifer,

19 and, at the same time, we give ourselves time to

20 collect more information, to have a better

21 understanding of the potential migration of

22 contaminants like plutonium. We also give

23 ourselves a better opportunity to understand how

24 the Tank Farm will be closed and how the governor's 25 agreement and the Environmental Impact Statement

Page 20

1 infiltrating to 20 percent of that number, makes

2 sense. So what we're doing is a decision -- or

3 what we're proposing is a decision that we think

4 makes good interim sense. It doesn't interfere

5 with the final, and it may give us some protection.

AUDIENCE MEMBER: Can you give us a 7 summary of the measures that you will take to

8 control the run-off?

MR. PIERRE: Yes. I can give what is 10 used at this time, recognize at this point we're

11 talking about technology talk, which is a general

12 statement, and as we go through the remedial

13 design, we go into more specifics. So the

14 obligation is to control the run-on and percolation 15 by 80 percent. That is a lot of water. The steps

16 that we will have to take is surface sealing of

17 the soil. Steps that we will have to take is

18 preventing flooding from the Big Lost River,

19 redirecting the drains on buildings, potentially

20 other activities, but those would be some examples.

21 AUDIENCE MEMBER: You said earlier in 22 your presentation that the contaminants would go

23 through the soil into the aquifer and eventually

24 come out in the Snake River, perhaps, around Twin 25 Falls. Do you have any evidence at all that shows

19 there?

20

Page 24

Page 21 1 that something will come out of the aquifer at Twin 2 Falls? 3 MR. PIERRE: No, actually, I never said. AUDIENCE MEMBER: I thought you did. 4 MR. PIERRE: I said it would go into the 6 aquifer. As far as where that goes, we have no 7 reason to believe, at this time, that contaminants 8 would exceed the Safe Drinking Water Act beyond the 9 INEL boundaries. 10 AUDIENCE MEMBER: That isn't what I --11 that's all right. 12 One other thing that you said that the 13 movement of plutonium would depend highly upon the 14 PH of the soil. 15 MR. PIERRE: That's one of the factors. 16 AUDIENCE MEMBER: That's one of the 17 factors. Could you explain why an acidic soil or a 18 basic soil would accelerate plutonium through

MR. PIERRE: Actually, I would defer 21 that to others in the audience. One of the things 22 that we're looking at with PH conditions may be 23 that the contaminants will be more soluble or that 24 there will be less salting out, would be one. In 25 other words, other contaminants, which would Page 22 1 minimize some the solubility, would be either

2 dissolved or precipitated out, is one aspect. 3 Nitric acid is also an oxidizer. It's one of the 4 acids that we're dealing with, but that can change 5 the oxidation state of the metal. Those would be 6 two aspects of it. It's outside of my field, so I 7 don't want to go into any detail. I don't know if 8 we have anybody in the audience who is good at --9 we'll talk more about it later. Any other clarifying questions? 10 MR. JENKINS: Thank you, Wayne. I'm 12 going to talk about the contaminated soil sites. 13 What we have under what we're calling the Group 2, 14 or soil under buildings, are four sites. The first one is a French drain. 15 16 Basically a dry well that we dumped water into 17 underneath the 603 complex. This drain was used 18 prior to construction of the dry site. When they 19 constructed this, they actually dug down and took 20 part of it away. The second site -- we have two 21 sites underneath the 604. The first one was where 22 they found contaminated liquid underneath one of 23 the liners in one of the hot cells. The second one 24 was when they were building a fire escape exit,

25 they actually dug through some contaminated soil.

Page 23 The fourth one within this group is a 2 steel liner that corroded away and dumped 3 radioactive liquid waste into the soil beneath the 601 complex. That's what we know. What we don't 6 know, we really don't know what D&D is eventually 7 going do to these facilities. They could look at 8 anything from complete removal of the facility to 9 complete entombment, i.e., turning it into a giant 10 block of concrete. 11 We also don't exactly know if the 12 structure would act as a long-term cap, but we do 13 know that it is, right now, as long as it's in 14 place -- actually kind of acting as a cap would, 15 which is minimizing the infiltration. Based on this, the agencies believe that 16 17 a deferred action is warranted, i.e., this would 18 be that we wouldn't take an active remediation 19 on these four sites until the D&D has been 20 completed. By D&D I mean the deactivation, the

24 Again, our objective in this one is 25 primarily protection of the aquifer and protection

22 activities associated with closure of these

23 facilities.

21 dismantlement, the decommissioning, or any other

1 of future workers in that there is no access right 2 now to these contaminated soils. Again, we looked at a range of 4 alternatives, No Action for comparison purposes. 5 In a containment this would be placing a cap over 6 the facility or over that contaminated soil, all 7 under D&D. Alternative 3, which is actually 9 excavation and disposal of contaminated soil, is

10 contingent on the D&D removing the facility. Again, we think one of the likely 12 outcomes would be that D&D, entombed in place. We 13 have one facility right now undergoing that kind of 14 an approach and that is the old calciner facility. 15 We also believe that Alternative 2 would provide 16 intrusion, protection, and infiltration protection 17 for about a thousand years. This would allow the 18 contamination that is present to essentially decay away in place. Based on this, Alternative 2 is the

21 The next group is what we're calling 22 other surface soils. This is basically a group of 23 20 sites that were anything from spills,

24 intentional discharges of radioactive liquid 25 waste, based on the accepted practice at the time.

20 agencies' preferred alternative.

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Page 28

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1 Decontamination fluids, storage of contaminated

- 2 equipment and contamination that leaked from
- 3 there. And we also have some soils that have been
- 4 cleaned up and stuck into boxes.

What we know. We have 20 sites that are

- 6 contaminated with primary radionuclides. There are 7 some metals, and each of these sites present an
- 8 unacceptable risk. The contamination on these
- 9 sites generally range from surface, i.e., a couple

10 of feet in depth, all the way, in some cases, down

11 to 40 feet, the top of the basalt.

12 Based on what we know, we estimate that 13 we have 82,000 cubic yards to deal with. However,

- 14 we don't have a real good handle on horizontal and
- 15 vertical extent, in that, when we went and sampled,
- 16 we actually looked at the hot spot where the
- 17 release was at and didn't try to get the extent of
- 18 the plume. So this gives us an uncertainty on the
- 19 volume. In addition, with some of these sites
- 20 having contamination at depths greater than 10
- 21 feet, which is the basement scenario we have looked
- 22 at for the clean-up scenario, we may have
- 23 unacceptable leachable concentrations below that
- 24 which would drive us toward excavating to a deeper
- 25 depth, which would also increase the volume.

14 designed for acceptance of that kind of material. 15 Based on this, the agencies believe that 4A is the

16 preferred alternative.

10 worker exposure.

2 wouldn't get a permit.

17 SFE-20 tank is an underground tank, this 18 being grade level. This is below 10 feet. This

1 standpoint but not administrative, i.e., we

5 a commercial facility for ultimate disposal.

7 increased short-term risk, i.e., because of the

8 treatment to get it acceptable for off-site

4B is removal, treatment, and off-site

4 disposal. This is where we evaluated sending it to

I'll just skim down. 4B has some

9 shipment, we have a higher treatment cost and more

4A, we would essentially be doing

12 something similar to 4B except it would be on site,

13 but we would still be disposing of it in a facility

- 19 being the tank down here. What we have is a tank
- 20 that was used to collect radioactive liquids from
- 21 1957 to about 1976. In 1976 we cut and capped the
- 22 lines and, basically, abandoned the tank in place.
- 23 What we know is that there are various radioactive
- 24 constituents in there, primarily cobalt, cesium,
- 25 strontium along with some plutonium and Eu and

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Based on these, we believe that remedial 2 action is warranted. Again, primary purpose to 3 protect the aquifer and prevent an unacceptable

4 risk from a surface exposure.

Again, we looked at a variety of 6 alternatives anywhere from no action, institutional 7 controls. This would, essentially, be restricting 8 access to these areas. Alternative 3 is to place a 9 containment structure, i.e., a cap over each of 10 these release sites.

11 The last two that we evaluated were 12 excavation, treatment, if necessary, and either 13 on-site or off-site disposal. I don't know how 14 many people have heard about it, but we have been 15 talking about an on-site disposal facility. The 16 on-site disposal facility is under 4A. This is 17 a -- the best way to think is like a module-like 18 approach. For this plan we would be constructing

19 the cell capacity necessary to implement this 20 remedy, but it would be designed in such a way as

21 the other future CERCLA decisions to expand the

22 capacity if necessary.

This facility would be RCRA compliant, 24 but not a RCRA facility, i.e., it would meet all

25 the requirements of RCRA from a substance

1 Pu isotopes.

2 If we do nothing, eventually the

3 contamination would leak out of the tank and 4 the tank contents would eventually reach the

5 environment, which could eventually, at some point,

6 reach the aquifer. What we don't know is actual

7 concentrations of the contaminants within the

8 liquid or the sludge and that we have about

9 400 gallons of liquid and about 55 gallons of 10 sludge.

11 Based on this, the agencies believe

12 remedial action is warranted. This would prevent

13 contamination of the aquifer. Again, we looked at

14 a variety of alternatives, anywhere from a No

15 Action to Alternative 4, which is complete removal.

16 treatment, and disposal.

17 Alternative 2, basically, fills or 18 entombs the facility in place, fills the tank

19 the rest of the way full with concrete and

20 the structure.

21

Alternative 3 is similar to

22 Alternative 2 with the exception that we would

23 remove the liquid prior to grouting and the liquid

24 would be treated.

Alternative 4 would remove the liquid.

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1 treat it, remove the sludge, treat it, and 2 dispose and remove the structure, the piping 3 and the associated facility and dispose of it 4 appropriately.

Based on that, the agencies believe that 6 Alternative 4 is what we are calling our preferred 7 alternative.

8 Group 6 are the buried gas cylinders in 9 two isolated areas outside of the facility. One 10 over here by the river, Lincoln Boulevard, and the 11 other located kind of northeast of the facility. 12 This one over here was basically construction gas 13 cylinders that were basically disposed of in a pit 14 or a trench when they completed construction of the 15 Chem Plant. We believe there are between 40 and 16 100 buried gas cylinders. These are cylinders 17 that have acetylene or oxygen or carbon dioxide 18 that are used in welding, cutting operations. 19

In the case of the other one, Site 94, 20 we have four cylinders that are suspected of 21 containing hydrofluoric acid. That's what we 22 know. We do know or suspect that if we do 23 nothing, we would have a potential for a fire or an 24 explosion, in that, at some point, these contents 25 would be released. What we don't know is exactly

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1 deconing of the facilities, the soil, which you're 2 now starting to talk about?

MR. JENKINS: That was part of the

4 reason I said the preferred action was 5 appropriate. We don't really know that -- there

6 are plans right now. They are gearing up for 7 deconing or starting to decommission the 601

8 facility. The 604 facility will probably be around

9 for the next 20 years or so. 603, we're supposed

10 to have the fuel out of there by 2035. So what we

11 really have is facilities that are going to be

12 around for a very long time. We don't know what

13 they're actually going to end up with, but we

14 believe, at this point, the structure is acting as

15 a cap and the contamination beneath it is not

16 leaching.

17 AUDIENCE MEMBER: So you would pursue 18 that even with those dirty facilities above it? MR. JENKINS: We would -- let's say that 19 20 they decided to entomb the 601 in place. What we 21 would try to do is make sure that whatever 22 entombment they did was protective enough that 23 whatever cap we came up -- we wouldn't have to 24 build a lot of cap over that area. It's one that

Page 30

1 what was buried along with the containers or how 2 much pressure is in those containers.

3 Based on this, we believe that action is 4 warranted. This would reduce the safety hazards 5 associated with these two sites. We looked at 6 three alternatives. Again, our No Action that we 7 compare everything against, our removal and 8 treatment and disposal action. This would 9 essentially excavate the cylinders, stick them 10 in a containment facility, release the gases, 11 treat the gases, and then dispose of the cylinders 12 appropriately. And the third one would be a 13 containment, to place a cap over both of the two

15 Based on these, Alternative 2, like I 16 said, remove it, but there is a safety concern 17 any time you're dealing with pressurized gas 18 cylinders. We still believe that Alternative 2 is 19 the best thing that we can do for that. Any 20 clarifying questions before I turn it over to Scott 21 Reno?

22 AUDIENCE MEMBER: Soils under the 23 buildings, obviously, got to be tied into decon, et 24 cetera, the buildings. How do you guys tie into 25 that or have they, for example, begun to address

1 that one.

AUDIENCE MEMBER: Coordination is. 2 MR. JENKINS: Coordination is a big 3

25 we're really going to have to have a big issue on

issue on that one.

AUDIENCE MEMBER: If I might, one more 6 question. The new engineered facility, that's what

we don't need more of, which we're going to process

this stuff and get a new facility and contaminate

9 it. That would be a constructive comment, I

10 think. A new engineered facility, my goodness.

MR. JENKINS: Oh, you meant from the 12 soils to obviously become contaminated.

13 AUDIENCE MEMBER: Yeah.

MR. JENKINS: Maybe I confused you 14

15 there. What we're talking about is a landfill. It

wouldn't have be to be deconed afterwards. What

17 we're talking about is excavating a hole in the

18 contaminated area. We would put clay in the

19 bottom, then we would put a couple different layers

20 to collect the leachate, a little bit of soil above

21 that, then we would actually start hauling the

22 contaminated soil on top, and that the cap would be

23 placed over the top of that on that.

24 AUDIENCE MEMBER: Not necessarily a

25 structure then?

14 sites.

Page 33 MR. JENKINS: No, there wouldn't be a 2 typical structure. AUDIENCE MEMBER: Could you give me the 3 4 dates again. 5 MR. JENKINS: I believe in the case of 6 601, we're starting, that is, started to wrap up a 7 little bit. It's one of the issues that we will 8 deal with be under the EIS. We will make some kind 9 of a decision on that in the near term, i.e., in 10 the next couple years. In the case of the PEW, the 11 604 complex, that is one that we're still using to 12 treat waste, so it could be around for the next 13 20 years or so. And 603, we know that we have to 14 have the fuel out of there by 2035. That is not a 15 bad date to pick from. 16 AUDIENCE MEMBER: Will all three 17 buildings, D&D decisions be made in the EIS? MR. JENKINS: I'm not sure on that, 18 19 Tom? 20 MR. WICHMANN: I'm Tom Wichmann with the 21 Department of Energy. We will analyze the impacts, 22 the alternatives, Beatrice, but I do not know if 23 those decisions will be made at this time back on 24 the plutonium. We will look at the impacts, but I 25 don't know what is in the people's minds back Page 34

Page 35 1 tanks around the nation used for all kinds of 2 industry that are sitting out there unprotected? 3 And so why are we so concerned about these that 4 are buried, if they have the same kind of gases 5 that we can go down to the store and buy? MR. JENKINS: Basically, what we have 7 here is a dump, in that when they actually went out 8 and were constructing -- at least for the acetylene 9 and oxygen cylinders, there was a nice convenient 10 hole and they just buried them. They have flooded 11 out once before. They were washed out when the Big 12 Lost River flowed in the '57, '58 time frame. 13 AUDIENCE MEMBER: Have any injuries 14 occurred? 15 MR. JENKINS: No, none that I'm aware 16 of. 17 AUDIENCE MEMBER: One other comment I 18 may make -- if I may? 19 MR. JENKINS: Yes. 20 AUDIENCE MEMBER: It would be helpful to 21 have page numbers on here. 22 MR. JENKINS: Oh, okay. 23 AUDIENCE MEMBER: On the hydrofluoric 24 acid tanks, since they are several hundred yards

25 from the facilities, why not just let them

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1 East. 2 We will certainly look for public 3 comment. If the public feels strongly that those 4 decisions should be made, let us know. That will 5 help. But we are going to look at the impacts. AUDIENCE MEMBER: The impacts of D&D; is 7 that correct? MR. WICHMANN: Yes. 8 AUDIENCE MEMBER: The contents of these 10 cylinders that you're talking about, what kind of 11 gas? Any radioactive gas? MR. JENKINS: No. 12 AUDIENCE MEMBER: You said there was a 13 14 potential for fire and explosion hazard due to a 15 eventual deterioration. You seem concerned that we 16 have to take those up. Won't the hazard be greater 17 as we took them out rather than leave them there? 18 MR. JENKINS: To excavate them, it is a 19 higher short term, i.e., a worker risk than the 20 risk to the worker would be if we left them in 21 place. However, there are companies out there that 22 do this for a living. We wouldn't just go in, 23 mucking and trucking.

1 deteriorate and explode one by one? What is the 2 problem with that? 3 MR. JENKINS: Does somebody want to 4 answer that one? MR. JAMES: If I could help out a little 6 bit, Tally. This is Bob James with Lockheed. 7 Lockheed-Martin. I think the issue with the gas 8 cylinders is probably over a short period of time a 9 greater risk by retrieving them, but we know when 10 that risk is going to occur so we can manage it. 11 If we leave them uncontrolled, the way to bet is 12 that they will fail when no one is around but there 13 is no way to guarantee that. If we actively go out 14 and retrieve them, we can define when that risk 15 will occur and we can takes steps to mitigate the 16 risk. If we leave them alone, there is not telling 17 what might happen. AUDIENCE MEMBER: How long have those 18 19 tanks been in the ground? MR. JAMES: One group since the '50s. 21 the group that is by the river. And the compressed 22 gas cylinders were required to be hydrostatically 23 tested every five years. And hydrotesting in the 24 early '60s, wasn't it?

AUDIENCE MEMBER: No, 1956.

25

25 that. Is there not literally millions of these

AUDIENCE MEMBER: One other question on

24

MR. JAMES: We have no idea, really. 1 2 what the condition is or what the deterioration 3 rate may be.

MR. SIMPSON: Can we hold off on some of 5 the questions until we get through. I know there 6 is a great interest in hearing Scott's portion of 7 the presentation. We talked about water. Can we 8 hold off on some of these.

MR. RENO: I want to thank you for the 10 good turnout tonight. We've been working on this 11 for a long time, and I think that you can see how 12 complex this project is and how many different 13 angles and different nuances it has.

I'm going to go ahead and wrap up these 15 last two sections. It will take 10, may be 16 20 minutes, then we will hear from you which is why 17 we're really here.

18 This informational session is provided 19 for the benefit for those who maybe unfamiliar with 20 the facility. I see a lot of people around here 21 who have a real intimate knowledge of the INEEL. 22 and the Chem Plant in particular. And for you 23 folks, please don't be insulted if I talk about 24 things in layman's terms, but I'm going to try to 25 make this as simple as I can to understand for

1 is primarily sand and gravel. And it's underlying

2 the next 60 feet to 110 feet below the ground 3 surface, mainly fractured basalt. There it

4 encounters a less permeable layer. It's clay and

5 sand. You can think of water when it gets there

6 not moving as fast and somewhat ponding within the

7 floor spaces that are present in the fractured 8 media.

In the perched water what we know about 10 it -- actually, I was asked to point out that last 11 figure I showed you with the injection well, we'll 12 get to this in a minute.

For the contaminants in the perched 13 14 water, we know that we have technecium-99. We have

15 nitrates. We have strontium-90. We have

16 neptunium-237, and we have tritium. The primary 17 contaminant in the perched water is our

18 strontium-90. We have seen concentrations of the

19 strontium-90 as high as 500,000 picocuries per

20 liter in the perched water bodies. And by 21 comparison, the drinking water standard for

22 strontium-90 is only 8 picocuries per liter. We

23 also feel that we have at least one well that

24 indicates that we have a continuing flux of perched

Page 40

25 water carrying surface contaminants to the aquifer

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1 those who aren't familiar with the facility.

The key to understanding how the 2 3 contamination moves at the Chem Plant or the INTEC

4 facility is understanding how the water moves.

5 The aquifer and the perched water bodies are

6 interrelated, in that the water that comes into the

7 surface, either from man-made sources, are pumped 8 out of the aquifer and are recharging elsewhere, or

9 a natural precipitation affect these perched water

10 bodies, which, in turn, mobilizes the contamination

11 or dissolves contamination and can carry it to the 12 aquifer.

13 We have three perched water bodies at 14 the Chem Plant. The first major perched water 15 is 110 feet below the ground surface. The second 16 one is at 140 feet, then we have another 17 significant perched water body at 380 to 420 feet 18 below the ground surface. And then the regional 19 aquifer, the Snake River Plain Aquifer is present 20 at about 460 feet below the ground surface. That 21 aquifer is about 250 feet thick.

22 What is perched water? Perched water is 23 water that is migrating down from the surface 24 through the porous media that is present, the upper 25 portion. The upper 40 to 50 feet at the Chem Plant 1 today.

Now, the sources that reach the aquifer,

3 the primary source is the plants' percolation 4 pond. They are south of the facility, and they

5 contribute on the order of 690 million gallons a

6 year of recharge to these perched water zones. The

7 second largest source of recharge or of water

8 available to these perched water bodies is the Big

9 Lost River. And that source is variable. It

10 varies from between 100 to 200 million gallons a

11 year, but we really don't know for sure because

12 some years the river doesn't run at all. Some

13 years it runs

14 year-round. We are going to try to further

15 quantify that in conjunction with the Tank Farm

16 investigation. On average, that river runs about

17 one year out of three.

The next largest contributor is natural 18 19 precipitation, rain and snowmelt. In the northern

20 area of the Chem Plant, which is our area of

21 greatest concern, the area beneath the Tank Farm,

22 we believe there is on the order of 4 million

23 gallons of recharge from natural precipitation. With the sewage treatment plant, that is 24

25 their sanitary waste water disposal infiltration

16

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- 1 lagoons, between 25 and 30 million gallons a year.
- 2 We have another 12 million gallons a year from
- 3 leaking fire water lines, another 2 million gallons
- 4 a year from lawn irrigation activities. And then
- 5 we've got a steam condensate disposal system that
- 6 essentially goes into dry wells. They are very
- 7 shallow, no more than 10 feet and filled with
- 8 gravel that disposes of the steam condensate from
- 9 the heating system from the facility. And that is

10 on the order of 4 million gallons per year.

What we don't know is, how much of this water do we need to eliminate from the system to

- 13 prevent contaminants from migrating to the aquifer
- 14 at unacceptable concentrations? For the perched
- 15 water, we didn't really do a risk assessment
- 15 water, we didn't really do a risk assessment
- 16 because we didn't believe that that water would be
- 17 available once man-made sources or recharge are
- 18 gone. That is, the plant is no longer in service,
- 19 things were brought to grade, and it's the only
- 20 natural precip in the river that recharges it.
- 21 So we didn't really do a risk assessment
- 22 for the groundwater pathway, but we know that there
- 23 is a good deal of contamination present in this
- 24 zone that will impact the aquifer. Our objective
- 25 is to reduce the leaching, the strontium-90 to the
  - Page 42
- 1 aquifer within a time frame that will allow that
- 2 aquifer to be usable again within 100 years and to
- 3 minimize these man-made resources of recharge to
- 4 the aguifer.
- 5 We looked at three alternatives. The
- 6 first one is our requisite No Action alternative.
- 7 The second one is we looked at additional
- 8 institutional controls to the existing controls
- 9 that are present at the facility and to take a
- 10 phased approach to, if you will, turn off some of
- 11 these water sources. For instance, moving these
- 12 perc ponds to an area that will no longer recharge
- 12 perc ponds to an area that will no longer recharge
- 13 this contaminated zone.
- 14 Then Alternative 3 is the same as
- 15 Alternative 2, only it would additionally seek
- 16 actively to remove this perched water from the
- 17 subsurface and treat it and dispose of it.
- Now, Alternative 1 doesn't protect the
- 19 aquifer, which already, in the area beneath the
- 20 Chem Plant, exceeds drinking water standards. We
- 21 have an ongoing flux of contamination though this
- 22 aquifer.
- 23 Alternative 2 would, over time.
- 24 eliminate this flux of contamination to the
- 25 aguifer. Alternative 3, which would further pump

1 and treat that, was a \$260 million alternative.

- A Alternative 2 1111 to 1 1111 to 1
- 2 Alternative 2, which is to let it drain out, to dry
- 3 it up and to turn off these sources is only a
- 4 \$30 million option.

5 For the value added, we do not feel that

- 6 the pump and treat had much to offer us. The
- 7 reasons for that are, this interbed -- these
- 8 interbed areas are not this nice sloped drain that
- 9 will lead to a well where we can extract all that
- 10 water and recover it all and treat it. In
- 11 contrast, if you have ever been to Hell's Half Acre
- 12 and you've seen the lava flows emulating, we
- 13 probably have an uneven surface there. No matter
- 14 where we put the wells, we are not going to recover
- 15 100 percent of this water to begin with.
  - Further, there is an absorption
- 17 coefficient that is associated with our primary
- 18 contaminant of concern, that is the strontium-90
- 19 that we think is between 12 and 24. That means
- 20 that one of 1/24th of the contamination is present
- 21 in the water portion. The other 23/24ths or
- 22 11/12ths, whatever the case may be, is present in
- 23 these soils. So if we don't get to pull all the
- 24 water out, we still have only recovered a minor
- 25 percentage of the total amount of contamination
- 1 there. We felt that the better alternative was to
- 2 remove the sources of recharge and to allow the
- 3 existing perched water to drain out.
- 4 Now, on to the aquifer. The primary
- 5 source of contamination in the aquifer is the
- 6 infamous ICPP injection well. From 1952 until 1984
- 7 one and a half to two million gallons of surface
- 8 waste water per day were discharged to this well.
- 9 which went directly to the aquifer. Over the
- 10 30 years or so that the well was in operation, some
- 11 11 and a half billion gallons of waste water was
- 12 disposed of through the well.
- The well was taken out of routine
- 14 service in 1984 and was permanently pressure
- 15 grouted shut from the bottom, which the bottom of
- 16 the well is 598 feet deep, but to the surface at
- 17 300- -- well, it was perforated with detonation
- 18 cord and pressure grouted at 300 PSI to the
- 19 surface, so that well is not going to be used any
- 20 longer. But it is the primary source of our
- 21 contamination. So 23,000 curies of tritium was
- 22 injected through that well over 30 years of
- 23 operation.
- As I mentioned before, we also have
- 25 somewhat of a contribution ongoing for perched

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1 water entering the top of the aquifer. We have

- 2 four contaminants that are present in the aquifer
- 3 today that are associated with the injection well.
- 4 They are mercury, which we think is confined to the
- 5 immediate area of the former injection well. We
- 6 have radionuclides: strontium-90, tritium, and
- 7 iodine-129.

This is the strontium-90 plume. On 8 9 the outside of this contour here corresponds to 10 this 8 picocurie per liter, strontium-90 maximum

11 contaminant level.

12

AUDIENCE MEMBER: Which line?

MR. RENO: This outside line. That is 13

14 the 8 picocurie line. For reference, if you're

15 familiar with the facility, this is the Central

16 Facility Area, which is about three miles south of

17 the Chem Plant. This is Lincoln Boulevard that

18 runs north and south throughout the INEEL. This is

19 Portland Avenue, which goes from CFA over to the

20 RWMC area in there.

21 How about that one. This is our tritium

22 plume. Again, this is the Central Facilities

23 Area. On the outside of this line corresponds to

24 our MCL contour line for tritium, which is 20,000

25 picocuries per liter. Now, the strontium-90 and

1 data in the aquifer is from this well, between

2 three and four picocuries per liter. But that is

3 over an open interval well, and we feel there may

4 have been some depth within that well that were of

5 higher concentrations that were diluting with,

6 maybe, somewhat cleaner water from other depths

7 within the aquifer. That is a key point when we

8 look at what our preferred alternative is for the

9 aquifer. I will get to that in a moment.

What we know is we have a sole source 11 of drinking water to the region. Strontium-90,

12 iodine-129, mercury, and tritium are the

13 contaminants of concern and that our fate, and

14 transport modeling are computer estimations of what

15 will happen in the future will indicate that with

16 no action, we're not going to be below those MCLs

17 100 hundreds from now. We may not be too far over

18 them, but we're probably not going to be under

19 them. And we know that we have an ongoing flux of

20 contamination from the perched water.

21 What we don't know, is we don't know

22 really how close we're going to be in our

23 predictions and what will happen in the future

24 for our groundwater model. So one of our

25 alternatives is going to look to verify some of

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1 the tritium both are fairly mobile contaminants.

2 That is, they move fairly readily in water, and

3 they have relatively short half lives.

The tritium has a 12.3 year half life.

5 The strontium-90 has a 29.1 year half life. What

6 this means is, since the injection well has been

7 taken out of routine service, these areas

8 corresponding to the strontium-90 and the tritium

9 MCL contour lines have been receding. They are

10 moving back closer to the plant. We do think that

11 due to this, current flux to the aquifer from the

12 surface contaminants that the trend is not as

13 pronounced as it was for the first few years

14 because of us reaching somewhat of a quasi-steady

15 state or equilibrium in the aquifer.

What we're not seeing, a real receding 16 17 of the plume, is our iodine-129 plume. The reason 18 is because iodine-129 has a 15 million year half

19 life. Even though it readily moves with the water

20 and dilutes and disperses, we're not seeing any

21 radioactive decay associated with the iodine-129.

22 This line right here is associated with 23 the area that currently exceeds the 1 picocurie per

24 liter drinking water MCL for iodine-129. The 25 highest measured concentration we have for recent

1 those modeling assumptions.

2 We believe that a remedial action is

3 warranted because we certainly have an MCL

4 exceedance in the aquifer that we think is going to

5 continue up until 100 years from present and we

6 would like to see the aquifer restored for

7 beneficial uses in the vicinity in the Chem Plant.

The first alternative is our

9 requisite, No Action alternative. Alternative 2A

10 is institutional controls, long-term monitoring,

11 and source control. That source control borrows

12 upon some of these perched water remedies. That is

13 that these sites are interrelated.

The modeling indicates that if we do 14

15 remove the percolation ponds as a source of 16 recharge to the perched water and eliminate pumpage

17 from the facilities' production wells that the

18 aguifer will, due to the delusion, disperse, and

19 decay, be suitable for use under our current

20 drinking water standards again 100 years from now.

So Alternative 2B, we seek to go out and 21

22 verify these modeling assumptions. What is being

23 proposed is five new monitoring wells that we would

24 sample at discrete intervals along the depth from

25 the top of the aquifer to the bottom to ensure that

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1 none of these intervals exceed an action level.

- 2 And action level, we establish it by asking our
- 3 computer model what concentrations is the maximum
- 4 we can see in the aquifer today of iodine-129 that
- 5 we can be sure that if we're below that, we will
- 6 still be below our drinking water MCLs in 100
- 7 years. The answer was 11 picocuries per liter. So
- 8 that is what we're looking for in these five
- 9 wells. If we exceed that, then we would pose a
- 10 contingent active remediation of that zone that
- 11 exceeds the 15 picocuries per liter, which we think
- 12 most likely will occur in the low permeability zone
- 13 that occurs. It's an interbed we have in the
- 14 middle of the aquifer, kind of sandwiched in.
- 15 The last alternative, Alternative 3, is
- 16 very similar to what I've just described for
- 17 Alternative 2B, only it's a contingent -- more
- 18 aggressive approach to groundwater pump and treat.
- 19 Instead of targeting a zone within the aquifer,
- 20 we would just pump over the entire depth of the
- 21 aquifer. Our preferred alternative is
- 22 Alternative 2B, which is institutional controls
- 23 with monitoring and contingent hot spot removal if
- 24 the action level is exceeded.
- 25 Which brings us to your last slide. We

1 levels of 11 picocuries per liter.

- MR. RENO: No, the highest that we've
- 3 seen, the highest concentrations observed in the
- 4 aquifer are between 3 and 4 picocuries per liter,
- 5 but it's over open interval wells. And these wells
- 6 have vertical gradients. There is mixing from the
- 7 different zones that are within there. The concern
- 8 is that if somebody wants to put a well in in the
- 9 future to use for drinking water purposes, that
- 10 there is not good control whether they could screen
- 11 that well for what zone they might be extracting
- 12 their water from.

13 AUDIENCE MEMBER: Is the mercury just a 14 side issue? You didn't address that at all in the

15 aquifer business.

16 MR. RENO: That's a good point. The

- 17 mercury is not a side issue. We feel that the
- 18 mercury is confined to the area immediately
- 19 surrounding the old injection well. We've never
- 20 really seen it in any of our monitoring wells, so I
- 21 think it's pretty much absorbed.
- 22 AUDIENCE MEMBER: I have one other
- 23 question. The perched water alternative to stop
- 24 the sources, that sounds like it would be a heavy
- 25 influence on the aquifer itself. Why don't we go

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- 1 want to know what you think. If you have any
- 2 questions that we can clarify what we're proposing
- 3 to do, we'll entertain those questions and try to
- 4 answer them the best we can. We encourage you to
- 5 comment and ask questions for things that you don't
- 6 understand. We expect to have a Record of
- 7 Decision issue next summer that will include our
- 8 Responsiveness Summary, all the comments that are
- 9 presented to us this week and before the comment
- 10 period ends. And we expect to get to work out
- 11 there immediately after the signing of the ROD this
- 12 summer.
- 13 AUDIENCE MEMBER: I have just one
- 14 question. You mentioned millions of gallons of
- 15 water that was put into the aguifer, but you didn't
- 16 mention how much water was in there, so I don't
- 17 know how much lemon juice you put in the lemonade.
- 18 MR. RENO: I've been told that the
- 19 Eastern Snake River Plain contains as much water as
- 20 Lake Erie. So, you know, there is dilution that
- 21 occurs there. We know what the concentrations
- 22 and the contaminants are in the vicinity of the
- 23 Chem Plant.
- 24 AUDIENCE MEMBER: On the map of the 25 iodine, it doesn't look like you found the action

- 1 ahead with that alternative regardless of whether
- 2 we do anything long term with the aquifer?
- 3 MR. RENO: I think that's a good idea.
- AUDIENCE MEMBER: That is something that
- 5 could be addressed now. Do we continue to add to
- 6 this perched water stuff out there?
- MR. RENO: Well, presently, until the
- 8 decision is reached but, you know, so the study
- 9 portion is over for the perched water portion of it
- 10 other than we are going to take a phased look.
- 11 We're not sure exactly which sources to remove to
- 12 stop the flux to the aquifer, so we will start
- 13 turning them off one by one.
- 14 AUDIENCE MEMBER: Because you said if
- 15 that were effectively done, in 100 years that might
- 16 well solve the aquifer problem if I understood you
- 17 correctly.
- 18 MR. RENO: You heard me correctly.
- 19 AUDIENCE MEMBER: What are the
- 20 percolation ponds used for?
- MR. RENO: The question was what the 21
- 22 percolation ponds are used for. And they are used
- 23 to dispose of plant service waste water. This is
- 24 cooling waters and processed water that is used
- 25 throughout the plant. The ponds currently have a

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1 permit from the state of Idaho to discharge the 2 service waste. That permit is up for renewal in 3 the fall of the year 2000. They are disposing of

4 the same kind of liquid that went down in the

5 injection well.

MR. RAUNING: Scott, in reference to 6 7 this question on shutting off the water, you might 8 mention that we're going through some steps to get 9 the perc ponds shut down.

10 MR. RENO: Dennis is right. The 11 Lockheed people and Department of Energy are 12 currently evaluating alternative methods for 13 disposing the plant waste water. This decision 14 hasn't been made yet. They do have to do something 15 to meet the new Idaho Groundwater Water Quality 16 Rule, which was promulgated in April of last year, 17 and will affect the effluent concentration limits 18 that will be allowed when the permit is reissued, 19 if reissued. Anyway, in an ongoing effort to

22 MR. SIMPSON: We can kind of deferred a 23 question that came up earlier during Talley's 24 portion of the presentation, and that is how these 25 soil types contribute to plutonium mobility --

20 evaluate an alternative way to dispose of the plant

1 surface soils, "What We Don't Know," there is a 2 bullet, "Depth of excavation below 10 feet will be

3 determined based on the leachability of

4 the contaminant." Did I hear you correctly refer

5 to the 10 feet as the basement level?

MR. JENKINS: Under our land-use

7 scenario, what we've decided is that -- what we

8 call a basement or the future residential use, it

was assumed that a homeowner would go out and dig a

10 10-foot basement. That's what we use for a depth

11 excavation, at least for an evaluation.

We do know for a couple places there are 12 13 significant contamination at depths greater than 14 this 10 feet. One of the issues that we'll still

15 have to deal with is, is that concentration high

16 enough and leachable enough that it would still

17 impact the aquifer if we were to remove the top

18 10 feet.

19 AUDIENCE MEMBER: So the first 10 feet, 20 though, is to protect the future resident? 21

MR. JENKINS: Yes.

MR. SIMPSON: I would like to take about 22 23 a 10-minute break right now. If you can think of

24 some questions during the break, we will come back

25 and address those at that time, and then we will

Page 54

1 sorry, that was during Wayne's.

21 waste water as we speak.

2 AUDIENCE MEMBER: The soil types that 3 we're talking about, especially in the Tank Farm,

4 we have highly acidic waste exposed to the tank and

5 so the soils that are contaminated in the Tank

6 Farm, especially the ones near the leaks, are also

7 still highly acidic. I think we have a pH2 in some

8 of our soil samples. Low pH soils or low pH

9 liquids tend to mobilize heavy metals. Plutonium

10 is a heavy metal, so that low pH, as long as that

11 stuff is in that state, is going to be fairly

12 mobile. As stuff moves down through our soil, it

13 will tend to be get buffered and neutralized

14 because we have so much calcium carbonate. Our

15 natural pH out there is about 8. So we think as

16 the sediment moves downward through the soil

17 column, it will gradually become less mobile. But

18 in the form it was released, it was released as a

19 processing liquid, and it was disolved in acid. So

20 it was released in a fairly mobile form, but the

21 high pH soil that we have will tend to reduce that

22 mobility very rapidly.

AUDIENCE MEMBER: I had a question that 23 24 may be well on the same lines, and it was from

25 Talley's presentation. In the list under other

1 have the formal comment session.

Are there any other questions at this 2

3 time?

(Recess.)

MR. SIMPSON: Are there any other

6 questions?

AUDIENCE MEMBER: Are these not

clarifying?

MR. SIMPSON: These are as detailed as

10 you would like them to be.

MR. PIERRE: Bob, if you want to come 11

12 up.

13 AUDIENCE MEMBER: The one that I have my

14 display open to is other surface soils, the

15 material, the contaminated soil that will go into

16 the engineered disposal facility, I understand that

17 you haven't established waste acceptance criteria

18 for it, but could you do some sort of thumb-nail

19 comparison between soils that will go into that

20 facility from the Chem Plant, compare that with

21 material that BNFL will be treating at RWMC, and

22 the material that might go back into Pit 9 after

23 treatment and the material that is being left in

24 place at the Naval Reactors Facility?

25 MR. PIERRE: Keith Rose is in the

25

9

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17

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Page 57 1 audience and is the EPA WAG manager for the 2 Naval Reactors Facility. I will take a shot at the 3 RWMC. The material that BNFL will be handling 5 is transuranic waste. AUDIENCE MEMBER: Not nearly all of it, 7 it's alpha. MR. PIERRE: The Subsurface Disposal 9 Area, we're looking at that material as -- the 10 decision that they're making is whether or not the 11 material exceeds 100 nanocuries per gram, those 12 wastes that exceed 100 nanocuries per gram of TRU, 13 transuranic, that material will be packaged and 14 sent to waste sites like the Pilot Plant. The 15 material that is less than that, as far as where 16 that is going to be managed, that decision, as far 17 as I know, has not been made -- I'm getting to 18 Pit 9 --19 AUDIENCE MEMBER: No, Wayne, I think 20 that you're incorrect about BNFL. I think a 21 good deal of the treatment at BNFL is driven to 22 transform alpha waste into TRU waste. It is 23 already -- it may be even lower than 6, but 24 potential 100, 10 to 100. They are not starting

Page 59 1 that because they are at the end of the discharge 2 pipes or whatnot, but I don't recall the exact 3 numbers. 4 AUDIENCE MEMBER: So it is pretty much 5 the same kind of soil that would go into the 6 Chem Plant? MR. ROSE: Yes. That soil is very 8 similar to what would be taken up from the Group 3 9 soil group at the Chem Plant and put into the 10 repository, yes, that would be similar. 11 MR. PIERRE: Does that answer your 12 question, Beatrice? 13 AUDIENCE MEMBER: Not the underlying 14 questions, but go ahead. 15 AUDIENCE MEMBER: I don't understand 16 alpha and transuranic. I've been out of it for a 17 couple years. Define that, please. 18 MR. NITSCHKE: Well, it's kind of an 19 INEEL distinction that has been made and there has 20 been some regulatory differences through time, but 21 statutorily, typically, what you're familiar with 22 is, transuranic waste is that waste having more 23 than 100 nanocuries per gram and nuclides greater 24 than 20 years or something.

At the INEEL, for the purposes of

25 with TRU waste. So let me rephrase the question. Page 58 1 What would alpha 10 to 100 go in this facility? MR. PIERRE: No, would be the simple 2 3 answer. And for Pit 9, alpha greater than 4 10 nanocuries per gram would also not go into 5 Pit 9 when Pit 9 is completed. Again, the same as 6 with Pit 9 and with the transuranic storage area, 7 you're right. A lot of the waste is alpha waste, 8 but the goal is to take the waste and wind up with 9 two waste streams. One waste stream is above 10 100 nanocuries per gram to another waste stream 11 that is below 10 nanocuries per gram. That is also 12 the goal of Pit 9. AUDIENCE MEMBER: For the Naval Reactors 13 14 Facility --15 MR. ROSE: I'm Keith Rose. I'm EPA's 16 project manager for the Naval Reactors Facility. I 17 don't recall the highest concentrations of 18 contaminants there, but the primary radionuclides 19 of concern are cesium and strontium, and I believe 20 the majority of the soil contamination there 21 presents a risk for the 100-year future residential

1 management disposal at the SDA, we set a limit of 2 10 nanocuries per gram. So we created this orphan 3 waste, essentially, between 10 and 100 nanocuries 4 per gram that we typically now call alpha 5 contaminated low-level waste. That is the 6 distinction between 10, 100, transuranic, and alpha 7 contaminated waste and below that is low-level 8 waste. AUDIENCE MEMBER: That particular waste 10 can be handled in nontransuranic facilities, is 11 what you're telling me? 12 MR. NITSCHKE: Not on the INEEL. AUDIENCE MEMBER: Between 10 and 100, I 14 mean. You're just saying that's just low plutonium 15 or low transuranic waste, and it's nontransuranic 16 waste. MR. NITSCHKE: It's still alpha 18 contaminated. It depends on what you're doing with 19 it and in its waste form you may take whatever 20 steps. AUDIENCE MEMBER: Does anybody else in 22 the world do this, categorize this? I don't know 23 now. I've been out of it a couple years.

MR. NITSCHKE: Of course, the limit

25 through the years has changed somewhat.

24 magnitude above that, but like 3 or 4. I know

23 it's not -- at least not in the order of the

22 scenario, like 3 or 4 above our clean-up goal. So

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Page 61 Page 63 1 AUDIENCE MEMBER: It's gone up, though. MR. PIERRE: And that is the upper risk 2 MR. NITSCHKE: But we kept it down for 2 range of that limit. 3 the purposes of disposal at the RWMC. AUDIENCE MEMBER: I told Tom Wichmann --4 AUDIENCE MEMBER: It's the B-10. 4 but he walked out -- that I had some EIS questions, 5 MR. NITSCHKE: Yeah, it is. But we kept 5 but but he walked out anyway. 6 it for other reasons, an intruder scenario and so It's my understanding that one of the 7 forth for disposal criteria. 7 alternatives being considered for high-level waste 8 AUDIENCE MEMBER: They kept it that way 8 tanks is either leaving them in place or, you know, 9 putting contamination in them, grouting them and 9 because it's all mixed together. 10 AUDIENCE MEMBER: So a little bit 10 leaving them in place. Does leaving those tanks in 11 place make your job of getting contaminated soil 11 doesn't hurt you. 12 AUDIENCE MEMBER: I have a question. We 12 removed harder? 13 have been talking about the dangers of this waste 13 MR. PIERRE: If the contaminants, the 14 and the problems caused by it, but in the past 14 mobility of the contaminants in the Tank Farm soils 15 50 or 60 years, have there been any known deaths 15 are such that a containment scenario, a capping 16 that can be traced directly to the buried waste or 16 scenario, would not effectively protect the 17 the stored waste or the transportation of any of 17 aquifer, yes, it would. Then we would have to 18 this waste? Are there any known deaths or injuries 18 evaluate the needs of one program versus the needs 19 because of these dangerous things that we're 19 of another. In other words, the objective of all 20 talking about, and if not, how dangerous are they? 20 the programs are to protect the receptors, protect MR. NITSCHKE: I think I like my seat in 21 the Snake River Plain Aquifer, to be protective in 21

Page 62

1 or so forth, the kind of effects that you get from 2 contamination, typically, are like cancer, which

As you are well aware, cancer is such a 5 pervasive result of aging, whether or not that 6 particular exposure or any one of a number 7 throughout your whole life in other situations is 8 maybe hard to distinguish, so I can't answer that 9 directly, but there aren't people keeling over, if 10 that was your question.

22 the back much better. I'm really not prepared to

23 answer that completely. I can give you my own

24 thoughts, most of the types of things that you're

3 would take place over time.

25 talking about, a death would be through an accident

11 AUDIENCE MEMBER: It was not quite my 12 question. How many of these people are keeling 13 over from cancer? For instance -- I understand 14 that about one out of four of us are going to get 15 cancer eventually, and you're talking about 1 in 16 10,000. How dangerous is the situation that's 17 causing one additional cancer in 10,000 compared 18 with going fishing?

19 MR. NITSCHKE: The fishing risk and the 20 carcinogenic risk are really to disparate to try to 21 make a comparison. What we're really saying is an 22 individual's incremental cancer risk is 1 in 23 10,000. You can argue how significant that is, but 24 that is the statutory limit that we're targeting

MR. JENKINS: Let me see if I can

25 would have to be reviewed.

2 clarify a little bit. I think the other part of

22 the world that we measure risk in. So if the

23 decision was to cap in place and if the risk was

24 unacceptable, then the decision to cap in place

3 your question was, for instance, if they filled the 4 vaults full of concrete would that make digging the

Page 64

5 soil up harder? The answer is no. Whether the

6 structure is there or not, it really wouldn't

7 impact that, but the risk to the groundwater would

8 be impacted by whatever we leave behind, either the 9 soil or what is in the tank. MR. PIERRE: What Talley is getting at, 10 11 the tanks sit on the bedrock, but it also gets into 12 what type of technologies we would need to look at 13 it as we do the investigation. Probably the 14 easiest way to answer that is, as we are doing 15 additional work, we will be back, or at least 16 some of us, by the year 2003, to discuss that 17 coordination. And at this time we don't really 18 know what the final solution is on the Tank Farm, 19 what is going to be left in place, what is going to 20 be removed. And we're collecting additional 21 information, as far as what the soils in the Tank 22 Farm represents, as far as the risk to the 23 groundwater and whether plutonium is one

24 contaminant that needs to be addressed, special

25 from the strontium-90 concerns.

25 for, and that's our job.

Page 65 MR. JENKINS: Did we answer that, 1 above 20 source areas. 2 Beatrice? 2 MR. JENKINS: I guess I'll answer AUDIENCE MEMBER: Yes, I guess, because 3 3 that in two parts. The first being for the 4 my next question was, in the Tank Farm presentation 4 investigation that we're talking about, we have 5 it said, "However, even if the site is eventually 5 actually gone out and interviewed former workers 6 capped as a landfill." And I wanted to know what 6 there, searched the records. That is how we came 7 is the possibility of that eventuality taking 7 up with the 95 sites. 8 place, and, perhaps, compare that eventuality to 8 AUDIENCE MEMBER: Ninety-five. 9 removing 10 feet of contaminated soil, less MR. JENKINS: Ninety-five is what we 10 contaminated soil than other areas. 10 started with. However, we have and probably will MR. PIERRE: I really have no idea 11 11 continue to identify additional sites all the way 12 of the eventually of capping in place. What I 12 through closure of the entire facility. So we 13 identified in my presentation was to take a look at 13 based our evaluation on the sites that we know at 14 what I would consider to be, let's say -- I don't 14 this point, and we have a process to capture those 15 want to use the worst case, but let's say an 15 that we identify in the future. 16 extreme case of trying to cap in place, that even 16 AUDIENCE MEMBER: But you would expect 17 under that scenario, because the interim action 17 that there may well be additional? 18 cannot be inconsistent with the final action. Even 18 MR. JENKINS: We may well come across 19 under that scenario, we would still want to prevent 19 more in the future. That was my only point because 20 run on. So the solution that we're proposing as 20 documentation and procedures and operational 21 the preferred alternative for the Tank Farm 21 conditions in those days weren't, I'll tell you, 22 soils from our understanding would apply to the 22 nearly so disciplined as we think they are now. 23 potentials that may occur in the decision on the 23 MR. PIERRE: One of the sad truths of 24 Tank Farm, but as far as the potential, that is 24 the Federal Facility Agreement and Consent Order, 25 something that I would defer you to Kathleen Trevor 25 when we created it back in 1990 and signed it Page 66 1 to discuss that.

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2 AUDIENCE MEMBER: It would seem to me 3 that Group 3 is an area, how large? MR. JENKINS: Group 3 is basically the 5 20 sites and together they added up to be, oh, 40 6 or so acres. AUDIENCE MEMBER: I guess my point is, 8 it would seem to me the other surface soils portion 9 of this project is probably the least confident in 10 the whole batch, based on it was developed as a 11 result of inadvertent spills, spills may or may not 12 have been documented, and I would say you indicated 13 54 or some number of instances. 14 Knowing the early days, how do you 15 determine that they aren't within these multiple 16 acres additional surface soils where some guy in

17 1958 took a value and dumped it in the ground and 18 it no longer is emitting radiation that is well 19 enough for you guys to determine? So that's a real bad one there. At 20 21 least around the Tank Farm and the other facilities 22 and bottles of gas, et cetera, you know, 23 generally, where they are. Unless you have more 24 sophistication now than what I'm aware of, those 25 things could be in that ground, locations well and

1 in '91 was this kind of static relief that we will 2 be able to go through the process once and reach 3 decisions. At that time, we had the thought of 4 2001. You can see it's not 2001 anymore; it's 5 2004. But the reality is, as the years go by, 7 new sites keep getting identified. The fact that

8 a lot of the closures are leaving waste behind,

9 leaving restricted and limited use. And I quite

10 honestly today see no end in sight for the Federal 11 Facility Agreement and Consent Order. It's going 12 on forever. 13 AUDIENCE MEMBER: It's more of a comment 14 than anything else. AUDIENCE MEMBER: My question is, as far 15 16 as the contaminated soil, is it not so that you 17 have to concentrate some of the contaminants in 18 order to have them acceptable by the WIPP? Is that 19 so? If that is so, are you not making the sample 20 more dangerous than it was before? So why don't 21 you go in the opposite direction and simply spread 22 this stuff out? 23 MR. PIERRE: I'll take the first part of

Page 69 1 Management Complex, and that's not what we're here 1 delusion is not a solution. 2 talking about today, but the Chem Plant. MR. SIMPSON: You heard it here, folks. But the fact is that DOE has a decision 3 3 Other questions? 4 that they cannot bury orphan waste, as I 5 mentioned before, or Pit 9 excavation or any other 5 6 excavation in the Radioactive Waste Management FORMAL COMMENT PERIOD 7 Complex. We do have to treat materials so that it 8 falls into one of two or alternatives. One is MR. SIMPSON: Any other questions? 9 below 10 nanocuries per gram. The other one is Okay. At this time I'd like to encourage people to 10 above 100. 10 comment for the record. And we have a court When I mention 100, the 100 for the last 11 reporter here tonight who will be recording your 11 12 time I saw the draft permit on the Waste Isolation 12 comments verbatim. 13 Pilot Plant, you are required to have a 95 percent Please, when you make a verbal comment, 13 14 confidence. So when we use the word 100, it's 14 state your name and spell it and give a mailing 15 really by measurement depending on which company 15 address so we can mail you the Record of Decision, 16 you're looking at. Banerra, I believe, it's 16 and your comment will be responded to in the 17 60 nanocuries per gram to achieve the appropriate 17 responsiveness summary section of the Record of 18 confidence level for the 100. Therefore the number 18 Decision. 19 then is 10 to 60. But the point is, yes, you do 19 If you would like to make oral comments, 20 need to do technologies for contaminated soil that 20 state your name. 21 is above 10 nanocuries. As you excavate from the 21 22 ground, you do need to do something whether that is 22 made? 23 a soil sorter, whether it's some sort of 23 24 vitrification or some combination of mingling that 24 to --25 or mixing that with soils of waste well above 100 25 Page 70 1 nanocuries per gram in order to achieve material 2 that WIPP will accept. If it's between 10 and 100, 3 it cannot be managed on INEEL, and I don't know any 4 place that we can send it. 5 MR. SIMPSON: Are there any other 6 questions? 6 by which they have to abide.

AUDIENCE MEMBER: The ones we've already MR. SIMPSON: Mr. Jobe, I think you have MR. JOBE: I'm Lowell Jobe. I will give Page 72 1 you a copy of this, the comments from Coalition 21 2 regarding the proposed cleanup. The proposed plan 3 for the clean up for the contaminated soils in the groundwater appears to be well done under the 5 overall conservative assumptions in the regulations Our major concern is with the estimate 8 and the calculations, in that overly conservative 9 values have been used due to using a linear- and 10 no-threshold approach, which has been shown to be 11 incorrect. Recent scientific values of at least 12 13 5 rem -- and there are actually two more recent 14 values of 10 and 20 rem that have been reported 15 instead of the 15 MR would lead to much lower 16 cost figures for accomplishing a cleanup. 17 Therefore, we feel that either these higher figures 18 should be used, or at least as an alternative cost 19 estimate. We expect to comment further before the 20 deadline of December 22 after further study of 21 these documents. That's the main point there. 22 MR. SIMPSON: Thanks. Anyone else? AUDIENCE MEMBER: I would like to make a 23 24 comment on what Mr. Jobe just said and that was 25 that 15 MR. That 15 MR is 15-thousandths of 1

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1 rem. And you noted that he went up to 10 and even 2 20 rem. So that 15 MR is less than 1-thousandth of 3 the amount of radiation that some people consider

4 as satisfactory.

My name is George Wood. My address is 6 1680 North Main Creek Road, Pocatello, Idaho 7 83204. My telephone number is 233-3421. MR. SIMPSON: Anyone else? Beatrice, 8

9 would you?

10 AUDIENCE MEMBER: My name is Beatrice 11 Brailsford. I'm the program director for the Snake 12 River Alliance. We will have written comments at a

13 later date.

These are concerns that I have already 14 15 shared with the agencies, not just this evening but 16 before this meeting began, that there seems to be a

17 lack of -- it's not a lack, but we are making

18 decisions, if not in a piecemeal fashion, then at

19 least, certainly, ones that may not total up to a 20 site that we want or at least that might not total

21 up to a site that we already know about.

22 I think the question that we have 23 repeatedly asked is, "Where will we be when we get

24 there? What is this site going to be like when

25 we're cleaning up?" If it's leaving soil in place

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1 that you folks are proposing to put in an

2 engineered landfill, and how do those two decisions

3 relate?

It now -- this evening we're told that

5 the assumption is that we're going to entomb in

6 place more than just sealed waste in calciner. Are

7 all these entombing in places covered in the mother

8 EIS, in the site-wide EIS? And the answer is no.

9 I can tell by the nod of your head that the answer 10 is no.

11 And down the road we are going to have a 12 lot of bits and pieces, and we're going to try to

13 work it in the WAG 10, but in WAG 10 we will have

14 made a lot of our commitments. Here you folks are

15 planning to remove the contamination from your tank

16 system, and the folks who are in charge of the

17 high-level waste tanks are thinking maybe they

18 won't take their tanks out of the ground.

19 I don't see an overall controlling

20 philosophy for what is going on at the different

21 WAGs. I understand that we're at this historical 22 point, that it may fall into place and it may not.

23 But I guess I do want to read just two sentences

24 from our colleagues at the Institute for

25 Environment and Energy Research.

"Institutional memory is short and if

2 the past is any guide, people in the future may use

3 contaminated resources for some time and make

4 investments before they discover the

5 contamination. They will then be faced with

6 wrenching decisions of whether to abandon their

7 investments or live with what would normally be

8 unacceptable risk or pursue remediation that, in

9 many cases, may be far more costly than the

10 original remediation and waste management

11 solutions." I want you to focus on the word

"wrenching." 12

13 AUDIENCE MEMBER: I want to add to my 14 earlier comment, if I may interrupt. The soil at

15 NRF, which I referred to earlier, is not being

16 left in place without treatment. That has been

17 consolidated and capped.

18 AUDIENCE MEMBER: But it's not going in

19 an engineered landfill.

20 MR. ROSE: That's correct.

21 It's going into an existing leach pit that is being

22 covered -- an engineered cover. That cover will be

23 adequate containment for that type of

24 contamination. It doesn't have the potential to

25 migrate and the cover will protect anybody from

1 external radiation. That is the only path that

2 we're concerned with, so it's a little different in

3 that regard, perhaps.

MR. SIMPSON: Any other comments? 4

5 Okay. I would just like to remind people that the

6 comment period closes -- or ends December 22nd.

7 And up until that time we will offer briefings for

8 anyone that is interested, and you may mail in any

9 comments. I have postage-paid comment forms here.

10 They wanted me to remind you that we

11 have basically extended the comment period already

12 in anticipation of public interest that we've had

13 so far. It's been very good public interest.

14 Also, I would just like to state that

15 the next time we will be holding public clean-up

16 meetings will be in the spring when we will be

17 discussing Waste Area Group 5. Their Remedial

18 Investigation and Feasibility Study in Waste Area

19 Group 5 is the Power Burst Facility and the

20 Auxiliary Reactor, and also Waste Area Group 4, and

21 the Central Facilities Area.

22 Thank you for the reminder, Ann. I

23 mentioned this earlier, the agencies have released

24 a revised proposed plan for Waste Area Group 1 and

25 that was based on public comment to do such. I

```
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 1 believe the comment period for that starts
 2 November 23rd. We don't have copies yet. It will
3 be mailed out tomorrow.
         AUDIENCE MEMBER: The comment period
  ends November 23rd?
         MR. SIMPSON: No, it begins November
 6
 7 23rd.
         MR. JENKINS: I would just like to thank
 8
 9 all you folks for coming out and taking the time
10 out of your evening to come and talk with us and
11 let us know what you think. With that, I'll turn
12 it over.
13
         MR. PIERRE: I second what Talley said.
14 Please remember that there is a postage-paid
15 comment form in the back of the proposed plan.
16 Again, just your thoughts, if not a detailed
17 opinion, whatever you think would be helpful to us
18 in trying to work out these issues and trying to
19 achieve a consolidated master plan on how to manage
20 the Idaho National Engineering Laboratory.
         MR. RENO: Ditto. Drive careful.
21
22
23
         (Meeting concluded at 9:05 p.m.)
24
25
                                                   Page 78
  STATE OF IDAHO
 3 County of Ada
 4
 5
            I, NANCY SCHWARTZ, a Notary Public in
 6 and for the State of Idaho, do hereby certify:
            That said hearing was taken down by me
 8 in shorthand at the time and place therein named
 9 and thereafter reduced to computer type, and that
10 the foregoing transcript contains a true and
11 correct record of the said hearing, all done to the
12 best of my skill and ability.
13
            I further certify that I have no
14 interest in the event of the action.
15
            WITNESS my hand and seal this 30th day
  of December, 1998
16
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                  State of Idaho
20 My commission expires:
21 September 28, 1999
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